IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
EL DORADO DIVISION

MID-CONTINENT CASUALTY COMPANY,	§	
Plaintiff	§	
	§	
v.	§	**CASE NO. 07-1056**
	§	**Consolidated With: 1:06CV1107**
JERRY C. LANGLEY,	§	
JERRY LANGLEY OIL COMPANY, LLC,	§	
GLENN SAMS,	§	
M&J OIL, LLC,	§	
RUSSELL CLAY MURPHY,	§	
CYPRESS PRODUCTION, LLC,	§	
JOHN D. MILAM,	§	
MILAM OIL CORPORATION,	§	
GARY SEWELL,	§	
SEWELL OPERATING, INC.,	§	
RICHARD HILL,	§	
STEVE ROGERS,	§	
HELEN W. LANDES, AS THE PERSONAL	§	
REPRESENTATIVE OF THE ESTATE OF	§	
RODNEY LANDES, SR., DECEASED, AND	§	
THREE SISTERS PETROLEUM, INC.	§	
Defendants	§	

PLAINTIFF'S RESPONSE TO COUNTERCLAIM OF SEPARATE DEFENDANTS JERRY C. LANGLEY, JERRY LANGLEY OIL COMPANY, GLENN SAMS, M&J OIL, LLC, RUSSELL CLAY MURPHY AND CYPRESS PRODUCTION, LLC, JOHN D. MILAM, MILAM OIL CORPORATION, GARY SEWELL, SEWELL OPERATING, INC., RICHARD HILL, STEVE ROGERS, AND HELEN W. LANDES, AS THE PERSONAL REPRESENTATIVE OF THE ESTATE OF RODNEY LANDES, SR., DECEASED

COMES NOW, Plaintiff, Mid-Continent Casualty Company, and for its Response to the Counterclaim of Separate Defendants, Jerry C. Langley, Jerry Langley Oil Company, Glenn Sams, M&J Oil, LLC, Russell Clay Murphy and Cypress Production, LLC, John D. Milam, Milam Oil Corporation, Gary Sewell, Sewell Operating, Inc., Richard Hill, Steve Rogers, and

Helen W. Landes, as the Personal Representative of the Estate of Rodney Landes, Sr., Deceased, contained in the Defendants' Second Amended and Substituted Answer filed on August 23, 2010, would show unto the Court as follows:

1. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 1 of Defendants' Counterclaim.

2. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 2 of Defendants' Counterclaim.

3. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 3 of Defendants' Counterclaim.

4. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 4 of Defendants' Counterclaim.

5. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 5 of Defendants' Counterclaim.

6. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 6 of Defendants' Counterclaim.

7. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 1 of Defendants' Counterclaim.

8. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 8 of Defendants' Counterclaim.

9. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 9 of Defendants' Counterclaim.

10. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 10 of Defendants' Counterclaim.

11. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 11 of Defendants' Counterclaim.

12. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 12 of Defendants' Counterclaim.

13. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 13 of Defendants' Counterclaim.

14. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 14 of Defendants' Counterclaim.

15. Plaintiff/Counter-Defendant denies the allegations contained in paragraph 15 of Defendants' Counterclaim.

16. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 16 of Defendants' Counterclaim.

17. Plaintiff/Counter-Defendant admits the allegations contained in paragraph 17 of Defendants' Counterclaim.

18. Plaintiff/Counter-Defendant denies the allegations contained in paragraph 18 of Defendants' Counterclaim.

19. Plaintiff/Counter-Defendant denies the allegations contained in paragraph 19 of Defendants' Counterclaim.

20. Plaintiff/Counter-Defendant denies the allegations contained in paragraph 20 of Defendants' Counterclaim.

21. Plaintiff/Counter-Defendant denies the allegations contained in paragraph 21 of Defendants' Counterclaim.

22. Plaintiff/Counter-Defendant denies the allegations contained in paragraph 22 of Defendants' Counterclaim.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that the Defendants' Counterclaim be denied, and that Plaintiff be awarded its costs expended herein, attorney's fees, and all other proper relief to which it is entitled.

Respectfully submitted,

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Attorneys for Plaintiff,
Mid-Continent Casualty Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing ***Plaintiff's Response to Counterclaim of Separate Defendants*** was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed.R.Civ.P 5(d) and Local Rule CV-5(e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of this document via email, facsimile and/or U.S. First Class Mail, on this 24th day of August, 2010.

/s/ R. David Freeze
R. David Freeze